

1 RENE L. VALLADARES
Federal Public Defender
2 Nevada State Bar No. 11479
MARGARET W. LAMBROSE
3 Assistant Federal Public Defender
Nevada State Bar No. 11626
4 411 E. Bonneville, Ste. 250
Las Vegas, Nevada 89101
5 (702) 388-6577/Phone
(702) 388-6261/Fax
6 Maggie_Lambrose@fd.org
7 Attorney for Cemone Champagne Lewis

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 CEMONE CHAMPAGNE LEWIS,
15 Defendant.

Case No. 2:18-cr-055-APG-GWF

**MOTION TO MODIFY PRETRIAL
RELEASE CONDITIONS**

16
17 The defendant, Cemone Champagne Lewis, by and through his undersigned counsel,
18 Margaret W. Lambrose, hereby requests this Court for a modification of his conditions of
19 pretrial release pursuant to 18 U.S.C. 3142(c)(3) and 3145(a)(2) to remove the condition of
20 home confinement and GPS location monitoring.

21 DATED this 9th day of October, 2018.

22 RENE L. VALLADARES
23 Federal Public Defender

24 By: /s/ Margaret W. Lambrose

25 MARGARET W. LAMBROSE
Assistant Federal Public Defender
26 Attorney for Cemone Champagne Lewis

LEGAL ARGUMENT

On August 8, 2018, this Court released Mr. Lewis on bond under Pretrial Services supervision with certain conditions. [ECF 37]. Among those conditions, this Court placed Mr. Lewis on home confinement and GPS location monitoring. However, at that time, this Court informed Mr. Lewis that if he was successful with home confinement and GPS location monitoring for a term of 30 days, Mr. Lewis could request removal of those conditions.

Mr. Lewis has been fully compliant since he last appeared before this Court over 30 days ago and thus he requests to have these conditions removed.

Pretrial Services Officer Kuipers does not oppose the modification. Counsel for the government also has no opposition to the modification.

DATED this 9th day of October, 2018.

RENE L. VALLADARES
Federal Public Defender

By: /s/ Margaret W. Lambrose

MARGARET W. LAMBROSE
Assistant Federal Public Defender
Attorney for Cemone Champagne Lewis

CERTIFICATE OF ELECTRONIC SERVICE

The undersigned hereby certifies that she is an employee of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on October 9, 2018, she served an electronic copy of the above and foregoing **Motion to Modify Pretrial Release Conditions** by electronic service (ECF) to the person named below:

DAYLE ELIESON
United States Attorney
PHILLIP N. SMITH, JR.
Assistant United States Attorney
501 Las Vegas Blvd. South
Suite 1100
Las Vegas, NV 89101

/s/ Stephanie Young

Employee of the Federal Public Defender